

UNITED STATES ENVIROMENTAL PROTECTION AGENCY

REGION 7 25 FUNSTON ROAD KANSAS CITY, KANSAS 66115

MAR 12 1999

FEB 0 4 1999

MEMORANDUM

SUBJECT:

Transmittal of Used Oil Inspection Report - RCRA

FROM:

Alma Moreno Lahm Moreno Lehn 1/19/49
Environmental Engineer, ENSV/ARCM

TO:

Jo Ann Heiman

Chief, RESP/ARTD

This memorandum transmits the following Used Oil Inspection report performed under a work assignment managed by the Environmental Services Division, Air & RCRA Compliance Branch.

Facility

EPA ID Number

Date of Inspection

Jebro Inc.

IAD0a0a01604

September 1, 1998

2303 Bridgeport Drive Sioux City, IA 51111

Attachments

ENFORCEMENT CONFIDENTIAL





FEB 0 4 1999

MEMORANDUM

SUBJECT:

CFC Checklist Transmittal

FROM:

Alma Moreno Lahm, Environmental Engineer

ENSV, Air RCRA and Compliance Monitoring Branch (ENSV/ARCM)

TO:

Alice Law, CFC Enforcement Coordinator

Air Permitting and Compliance Branch

No CFC checklist was completed for the following site in Iowa.

Facility

EPA ID Number

Date of Inspection

Jebro Inc.

IAD030301604

September 1, 1998

2303 Bridgeport Drive Sioux City, IA 51111

If you have any questions, please contact me at extension 5232.

ENSV:ARCM:C:\USER\AMORENO\09RO7047\CFCTRSTD.MEM:JEBROINC.IAD.CFC:AML:20JAN99

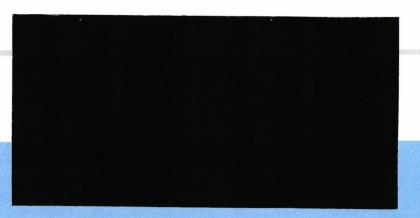
ARCM

MORENO LAHM

An Solur 2/3/99



U.S. Environmental Protection Agency Contract No. 68-W4-0004 Contract No. 68-W4-0004

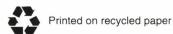


RCRA Enforcement, Permitting, and **Assistance Contract-EPA Zone III**



Tetra Tech EM Inc.





RESP

IOWA USED OIL INSPECTION JEBRO INC. IAD020201604 2303 BRIDGEPORT DRIVE **SIOUX CITY, IOWA 51111**

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY Region 7 Kansas City, Kansas 66101

Work Assignment Number

: R07047

EPA Region

: 7

Date Inspected

: September 1, 1998 : December 11, 1998

Date Prepared Contract Number

: 68-W4-0004

EPA Work Assignment Manager

: Alma Moreno Lahm

Telephone Number

: (913) 551-5232

Prepared By Tetra Tech Project Manager : Tetra Tech EM Inc. : Andrew Mazzeo

Telephone Number

: (913) 495-3940

ENFORCEMENT CONFIDENTIAL

RECEIVED DEC 3 1 1998 ARCM/ENSV

SUMMARY OF RCRA USED OIL INSPECTION JEBRO, INC. 2303 BRIDGEPORT DRIVE SIOUX CITY, IOWA 51111 IAD020201604

Inspection Participants:

Mr. David Homer, Tetra Tech EM Inc.

Ms. Lisa Wilson, Tetra Tech EM Inc.

Mr. Michael K. Marlow, General Manager, Jebro Inc. Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

Inspection Date:

September 1, 1998

List of Attachments:

Attachment A -- Confidential Business Information Forms

Attachment B -- Notice of Preliminary Findings

Attachment C -- Photographic Log Attachment D -- Inspection Checklists

Attachment E -- Other Supporting Documents

Attachment F -- RCRIS Handler Information Report

Submitted By:

David Homer

Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow



when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlordetect kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower that the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that its is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil-date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.

During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.

The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

ATTACHMENT A CONFIDENTIAL BUSINESS INFORMATION FORMS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

CONFIDENTIALITY NOTICE IADUZUZIOLUSUS 4
Facility Name Jebro Fac. Facility Address 2303 Bridge port Dr., Sionx City, JA. 51111
Inspector (print) David Homer U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 Date 41/98
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met: 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures. 2. No statute specifically requires disclosure of the information. 3. Disclosure of the information would cause substantial harm to your company's competitive position. Information that you claim confidential will be held as such pending a determination of applicability by EPA.
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time. Facility Representative Provided Notice (print) Signature/Date
I have received this Notice and DO want to make a claim of confidentiality.
Facility Representative Provided Notice (print) Susan Lowrey Susan Fourty 9-1-98
Information for which confidential treatment is requested: Tank information - capacities, volumes, storage, products Facility Photos

(Rev: 4/15/98)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR DOCUMENTS AND SAMPLES

1406515010901
Facility Name Teloro Inc.
Facility Address 2303 Bridgeport Dr., Slove City, JA. 51111
Documents Collected? YES (list below) NO
Samples Collected? YES (list below) NO Split Samples: YES NO
Documents/Samples were: 1)Received no charge 2)Borrowed 3)Purchased
Amount Paid: \$ Method: Cash Voucher To Be Billed
The documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained.
Receipt for the document(s) and/or sample(s) described below is hereby acknowledged:
photos (2) - wont of facility (signand tanks)
tay +343 missing "used oil" Placard
2) Pail of lading #15 \$387\$ and \$38764 (pickups) from Hawkinsloustrue Freds
1) Bill of Cading # 22423 to Brewer Construction (delivery)
2) Reports of Analysis of Tank \$20 from Mid west Caboratories Fur (98-210-2624 and
(1) Report of Analysis of Used oil studes (strainer) from Mid west laboratories, Fre. (98-14-2
(1) report of Analysis of uses of students of the first was the
Facility Representative (print) Susan Lowrey Susan hours
Inspector (print) Signature/Date David H. Ho mer David H. Homen 9/1/98
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115

(rev:1/20/93)

ATTACHMENT B NOTICE OF PRELIMINARY FINDINGS

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Jebro Inc.				
ADDRESS: 2703 Pridgeport Drive				
EPA ID NUMBER: 70020201004 DATE: 09/01/98				
NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.				
1. Failure to balsel used oil tambe # 343 with the words "used oil"				
2.				
3.				
4.				
5.				
6.				
7.				
If you have any questions regarding these findings please contact				
The undersigned person hereby acknowledges receipt of a copy of this document and has read the same. Safety and				
SIGNATURE: Susan Lowrey TITLE: Human Resource Supervisor				
This document was prepared by David Howev				
Page 1 of				

ATTACHMENT C
PHOTOGRAPHIC LOG

JEBRO, INC. Sioux City, Iowa



Photo No: 1 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1410 Description: Used oil tank #343 with "used oil" plackard missing.



Photo No: 2 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1446 Description: Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used

oil, the rest are asphalt.

ATTACHMENT D
INSPECTION CHECKLISTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

		USED OIL INSPE	ECTION FOR	M	
Company Name Jebro		Fue.	EPA Identification Number	TAD \$2 \$2 \$16\$\$	
Address	2302	Bridgeport Dr.	Telephone Number	712-277-8855	
& Zip	Sioux	Bridgeport Dr.	Fax Number	712-277-3451	
Company.	Susan	Lowrey	Title Safety Sup	LIVISOV.	
Contact	Michael K. Walow & Dr		General Manager Petroleum tzecorey		
Investigato	1	Homer	Investigation Date	49/41/18	
At This Lo	ocation Since	1972			
Number O	f Employees	36			
Facility Siz	ze	32.5 acres			
Business T	ype	liquid osphalt manufochuring			
Used Oil M Activities	lanagement	Paleys used cit.	transporter, s	torage, berned	
1 Desc	cribe How Used	Oil Filters Are Generated 05	fuel blendi	gagent, and sales	
N	ne		portable asph		
libra .				V	
				- C 486 : 20 : 20 : 20 : 20 : 20 : 20 : 20 : 2	
2 Used	Oil Filter Gener	ration Kate			
No	genery	red			

3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not cypplicable
6	List the Processes That Generate Used Oil
	no gennation
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
3	Used Oil Generation Rate
	not generated

9	State the Number and Size of Used Oil Storage Containers and Tanks On-site & the Amount of Used Oil in Each Tank and Container Current level
	Tank 5 1000, 000 gallon capacity 5/5,928 gallons
	18 9,900 gallan 5,232 gallans
	20 83 000 gallong 52,272 gallong
	29 8,000 gellons 3,562 gallons
	343 21,000 gallars 4,142 gallars
	344 17,000 gallons 14,263 gallons
	348. 17,000 gallars 2,803 gallars
	347 ZO,000 gallous - ausky
	4
0	State How Each Tank and Container Containing Used Oil Is Labeled
	343 not balaclast with "crowd oil" all other tombs
	had proper labelity.
1	For Each Tank and Container Containing Used Oil That Is Not in Good Condition. Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
1	
1	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
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	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
1	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
	Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
1 a	Describe Any Secondary Containment (Obtain Photographic Documentation) Describe Any Secondary Containment (Obtain Photographic Documentation)
	Describe Any Secondary Containment (Obtain Photographic Documentation) Describe Any Secondary Containment (Obtain Photographic Documentation)

12	Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)
	to spills found at the site.
	Describe Used Oil/hazardous Waste Mixing Activities
13	
	ho mixing of hazardous waste ansite.
1 =	
14	Is used oil burned in on-site space heater?
	If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater, and If the Heater Combustion Gases Are Vented to the Outside
	no space headers on site.
	VC GINCE VEC

15	State Name. Address. Telephone Number, & Epa Identification Number of the Transporter That Picks up the Used Oil (Obtain Written Documentation)			
Com	l transportation is seld tran	EPA Identification Number		
Add	ress	Telephone Number		
& Zi	р			
Com	pany Name	EPA Identification Number		
Addı	ress	Telephone Number		
& Z:	p			
16	If used oil is collected under a tolling arrange obtain a copy of the agreement/contract.	ement.		
	Not applicable			
17	Describe generator used oil self- transportat	ion activities		
	no solf transportation -	self transportation - facilly is a transporter		
	of used oil. Pieles,	up from generators and		
	delivers only to batch:	pet plants.		
45				
8	State the amount of used oil collected from do-	it-yourselfers per month		
	no collection from do-it-	gourselfers		

19	State the amount of used oil coilected	i from businesses per month		
	1 200,000 gallons/ma	ith approx.		
20	If Used Oil Is Collected from Other Businesses. Obtain a Copy of the Registration/ Permit/ License/ Authorization from the State / County/ N Government That Allows the Company to Run a Used Oil Collection Center.			
	Has indiffed EPA as	sa used oit generator, full marketer		
	If No Such Documentation Is Availab	nle. Please State Such:		
1	If Used Oil Is Collected from Other B Are Shipments of Greater than 55 G	usinesses. ailons Accepted?		
	Yes.			
	If So State the Following for Each St	December 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		
	Business Name	Telephone # the list, will have the reguested in to		
	Address & Zip	Contact Name Caletter from GPA.		
	Name	Telephone #		
	Address & Zip	Contact Name		
	Name	Telephone #		
	Address & Zip	Contact Name		
	Name	Telephone #		
	Address & Zip	Contact Name		

21a	Describe Any Hazardous Waste Generated at Facility, (Obtain Written Document	ation)	
٠	Facility Generates the Following Quantity:		
•	Facilty Appears to Be:	YES	NO
•	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR. Less than 100 KG/Month		
•	SMALL QUANTITY GENERATOR. More than 100 KG/Month and less than 1000 KG/Month	5	
•	LARGE QUANTITY GENERATOR. More than 1000 KG / Month		
22	NOTES:		
+	tas parts wasters that uses dused fuel, the fi ten recycled for asphalt or bouned as fuel.	uel 15	
754			
		•	

	LIST OF HANDOUTS PROVIDED TO THE FACILITY:
1	Assistance/Information Handout
2 ~	Used Oil Filter Study Summary/Used Oil Filters Management Information
3 /	Copy of 40 CFR 261.(b)(13)
4 /	Iowa Waste Reduction Center Pamplet

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name	Susan Lowrey	
Signature	Swanhowry	
	Date 9-1-98	

a: and chusedoil.796

THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT BECAUSE IT WAS NOT APPLICABLE

ATTACHMENT E OTHER SUPPORTING DOCUMENTS

Date of Revision: 07-09-98

Supersedes: 05-06-92 Page 1 of 2, **USED OIL**

MATERIAL SAFETY DATA SHEET

Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111 EMERGENCY PHONE: Chemtrec 1 800 424-9300

SECTION A: PRODUCT IDENTITY
Product Name: SPECIFICATION US

Product Name: SPECIFICATION USED OIL

Chemical Name: Oils, used engine

SECTION B: PHYSICAL AND CHEMICAL CHARACTERISTICS

Specific Gravity: 0.87-0.89
Solubility in Water: Negligible

Appearance and Odor: Dark brown liquid, characteristic motor oil

odor

SECTION C: FIRE, EXPLOSION AND REACTIVITY DATA

Flash Point: Pensky-Martins Closed Cup: 170-2105 Cleveland Open Cup: 300F minimum

Flammability Limits: Lower: N/A, Upper: N/A

Extinguishing Media: Dry chemical or foam

NFPA Hazard Rating: Health: 1, Fire: 2, Reactivity: 0

WARNING: Combustible liquid. Keep away from ignition sources. Use with adequate

ventilation.

Hazardous Polymerization: Will not occur

Hazardous Decomposition Incomplete combustion may produce carbon

Products: monoxide

Stability: Stable

SECTION D: POTENTIAL HEALTH HAZARD & ENTRY ROUTES

Symptoms of Exposure: Headache, dizziness, nausea.

Emergency Procedures:

Eyes: Flush with clear water for 15 minutes. No significant

irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead

to irritation and/or dermetitis. Can be harmful on

prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

ingestion: If ingested, induce vomiting. Get medical attention.

This product has a variable composition. It may contain component materials tapable of producing skin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been

shown to have relevance to humans.

SECTION E: PRECAUTIONS AND PROTECTION

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and bil impervious footwear when contact is likely. Use of safety glasses is good industrial practice.

Page 2 of 2, USED OIL

SECTION F:

SPILL OR LEAK PROCEDURES

Spill:

Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-8802.

waterwa

Asphalt cement will burn but is not readily ignitable.

Emergency:

Phone: Chemtrec 1 800 424-9300

SECTION G:

ADDITIONAL INFORMATION

This MATERIAL SAPETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111 Phone 712 277-8855

DATE 8-31-18 TERMINAL NO. Signature CARRIER NO. 5/3 KITS WPG 145 HALOGENS/SNIFFER 144 TERMS 244 TANK # 3#4 CUST. P.O. NO					MOTOR CARRIER BILL OF LADING Received, subject to tariffs and/or contract in effect on date of issuance hereof. Alackins Const. 372 Dec Ack Complex AE				
JS DOT NO. 245090									
JS DOT HAZMAT REG. NO. 060598 007 0)19			CUST. NO	D.:				
EMERGENCY TELEPHONE NO). 1-800-42	24-9300		CONSIGNE	D TO OR SOLD	TO: JEBF	RO INC.		
SHIPPING DESCRIPTION	PRODUCT	GROSS GAI	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT		
Gasoline, 3, UN 1203, PG II	Avgas								
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	250	250				NIC		
	Fuel Oil								
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						120		
Other									
Other									
Other									
THIS IS TO CERTIFY THAT THE ABOVE NAMED MAT PACKAGED, MARKED AND LABELED, AND ARE IN ACCORDING TO THE APPLICABLE REGULATIONS OF ACCORDING TO THE APPLICABLE REGULATION OF ACCORDING TO THE APPLICABLE OF ACCORDING TO THE ACCORDING TO THE APPLICABLE OF ACCORDING TO THE APPLICAB	PROPER CONDITOR THE DEPARTM released to the on of this material RRIER	Carrier is represal is the generat	PORTATION, PORTATION. Sented free of	per and carrier, ble bill of lading Classification Ni thereof, if carrie state shipment I have been legal terms of applica Carrier certifies proper containe	if a contract car form described o. A9. MF-1 C. C r is a common c by common car lly prescribed, th ible bill of lading that the cargo ta	rier, or (B) the te in the National N 2-9, supplements carrier, provided to ier in a state who is shipment shall."	ntract between ship- trms of the applica- Motor Freight s thereto or reissues that if this is an inter ere bills of lading Il be governed by the this shipment is a d by the shipper."	s r-	

DATE 8 31-98 TERMINAL NO. 510-74 CARRIER NO. 3/3 KITS VPG 74B HALOGENS/SNIFFER OF TANK # 344				MOTOR CARRIER BILL OF LADING Received, subject to tariffs and/or contract in effect on date of issuance hereof. And Amendy Service 2701 Lescence 4			
CUST. P.O. NO				(Inn)	and to		
EPA I.D. NO IAD020201604				Much.	hade		
JS DOT NO. 245090							
US DOT HAZMAT REG. NO. 060598 007 0)19			CUST. N	IO.:		
EMERGENCY TELEPHONE NO). 1-800-42	24-9300	0	CONSIGN	ED TO OR SOLD	TO: JEBR	O INC.
SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
asoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	900	400				NE
	Fuel Oil						
Zerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							
THIS IS TO CERTIFY THAT THE ABOVE NAMED MAT PACKAGED, MARKED AND LABELED, AND ARE IN FIGURE OF THE APPLICABLE REGULATIONS OF THE APPLICABLE REGULATIONS OF THE APPLICABLE REGULATIONS OF THE APPLICABLE REGULATION THE GENERATOR'S REPRESENTATION The generator hereby warrants that the material azardous waste under RCRA. Misrepresentation nancial responsibility to correct damages. SHIPPER	released to the	ION FOR TRANSPO MENT OF TRANSPO carrier is represe at is the generator	ORTATION, DRIATION. ented free of	per and carried ble bill of ladin Classification I thereof, if carristate shipment have been leg- terms of applic Carrier certifier	r, if a contract car g form described No. A9. MF-1 C. C er is a common of by common carr ally prescribed, the able bill of lading s that the cargo to	rier, or (B) the ter in the National M 2-9, supplements carrier, provided the ier in a state whe his shipment shall	thereto or reissues nat if this is an inter- re bills of lading be governed by the his shipment is a

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER



MOTOR CARRIER BILL OF LADING **ORIGINAL**

his shipment shall be governed by (a) the contract between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor reight Classification No. A3 MF-I.C.C. No. 8 issued by F. G. Freund, Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment by common carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

INVOICE TO: Brower Constructs P.O. Box 1137 Sloux City, IA 511	
	ral Sand & Gravel Pit located iles north and 2 miles east of
MILEAGE: DELIVERY TIME: DELIVERY DATE:	102 19:00 09/01/98
PROJECT NUMBER:	Saunders, Co (Yutan)
CONTRACT NUMBER PURCHASE ORDER	
FREIGHT TYPE: FINE IN: 9. TIME OUT: 9. CARRIER:	ebro incorporated repaid 11/9% 14:00 15/9% 14:49 lichael C. Harms IHarms96 /Jeb204
Carrier certifies that the cargo r transportation of this communication acards have been applied.	tank supplied for this shipment is a proper container modity as described by this shipper and that proper
I hereby certify that the max	mum legal weight for the vehicle transporting the
oods described above is:	
Mills.	
	DRIVER
Arrival Time: Unloading Began	ALPONOMIA DEL CONTROL DE PRODUCTION DE LA CONTROL DE LA CO
Dispagning Certain	CXISXONERX
Unloading Comp	
Pump Used or O	
Reason for Delay	ALTERNATION AND AND ADDRESS OF THE PROPERTY OF
-	
AND THE RESIDENCE AND THE PROPERTY OF THE PROP	
destruction of the second of t	

Customer Signature

	PRODUCT INFORMATION						
Combustible	Liquid, n.o.s.,	MA	1993, PG III				

Chemtrec: 1-800-424-9308 Jebro: 1-899-831-8937

Burner Fuel

SP.G.: 6.8879

7.3860 lb/gal: kg/lit: 0.8850 Temp 174 F; 79 Temp adj 0.95553 EMERGENCY CONTACT: 1-712-277-8855

LOAD WEIG	HTS AND QU	JAN	ITITIES	
Gross Lbs	76,500	(34,790	kg
Tare Lbs	29,860	ĺ	13,544	kg)
Net Lbs	48,640	į	21,156	kg j
Net Tons	23.32	1	21.16	Mg)
Not Gallons @69F	6,315	1	23,905	1)
Project# STPE-3425(3}			

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

TEMPERATURE FOR KINEMATIC VISCOSITY OF:

309 Cs =	0
150 Cs =	0
200 Cs =	9
50 Cs =	0

SEAL NUMBERS:

CERTIFICATE OF COMPLIANCE

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of

Mobraska

The transport tank was examined and found suitable for loading.

SHIPPER: JEBRO INC.

SUPPLIER AUTHORIZED REP. & WEIGHER

Need: "Fump"

Terminal: Sloux City. IA Bill of Lading Number:

22423



Report Number 98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC

(712)277-8855

Date Reported: 08/13/98 Date Received: 08/04/98

Mail to:

PO/Proj. #: 2596 TANK 20

JEBRO INC

2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001

Lab number: 412909

Sample ID: ID #83

	Level		Detection		Analyst-
Analysis	Found 1	Units	Limit	Method	Date
Total halogens	0.05°	%	0.02	ASTM D1317-118	jjd-08/05
Arsenic (dissolved)	n.d. 1	mg/kg	5.0	EPA 6010	pmd-08/13
Cadmium (dissolved)	1.28 r	mg/kg	0.05	EPA 6010	pmd-08/13
Lead (dissolved)	24.4 r	mg/kg	0.5	EPA 6010	pmd-08/13
Chromium (dissolved)	1.6 r	mg/kg	0.1	EPA 6010	pmd-08/13
Ignitability	218	deg F	39	ASTM D93	jjd-08/07

Notes:

n.d. - Not Detected.

Respectfully Submitted

Heather Ramig Client Services

7.387 380



Report Number 98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 07/29/98 Date Received: 07/08/98

Mail to:

PO/Proj. #: 2567 TANK 20

2303 BRIDGEPORT DRIVE

Lab number: 408025

Sample ID: ID #82

SIOUX CITY IA 51111-1001

JEBRO INC

	Level	Detection		Analyst-
Analysis	Found U	Jnits Limit	Method	Date
Total halogens	0.04 %	6 0.01	ASTM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d. m	ng/kg 5.0	EPA 6010	pmd-07/28
Cadmium (dissolved)	0.85 m	ng/kg 0.05	EPA 6010	pmd-07/28
Lead (dissolved)	27.3 m	ng/kg 0.5	EPA 6010	pmd-07/28
Chromium (dissolved)	1.6 m	ng/kg 0.1	EPA 6010	pind-07/28
Ignitability \(\)	183 de	eg F 39	ASTM D93	jjd-07/15

Notes:

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040.

Respectfully Submitted

Heather Rang

Heather Ramie Client Services



Report Number 96-114-2036

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 04/23/96

Date Received: 04/18/96

Mail to:

JEBRO INC

2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001 PO/Proj. #: 436139

USED OIL SLUDGE ANALYSIS - STRAINES

Lab number: 295669

Sample ID: TANK 38 ID # TCLP

	Level		Detection	1	Analyst-
Analysis	Found	Units	Limit	Method	Date
Arsenic (TCLP)	n.d.	mg/L	0.5	EPA 6010	acc-04/23
Barium (TCLP)	0.75	mg/L	0.005	EPA 6010	acc-04/23
Mercury (TCLP)	n.d.	mg/L	0.0002	EPA 7470	acc-04/23
Selenium (TCLP)		mg/L	0.10	EPA 6010	acc-04/23
Silver (TCLP)		mg/L	0.01	EPA 6010	acc-04/23
Chromium (TCLP)		mg/L	0.01	EPA 6010	acc-04/23
Lead (TCLP)	0.05	mg/L	0.05	EPA 6010	acc-04/23
Cadmium (TCLP)	0.01	mg/L	0.005	EPA 6010	acc-04/23
Nickel (TCLP)	0.03	mg/L	0.01	EPA 6010	acc-04/23
Copper (TCLP)		mg/L	0.01	EPA 6010	acc-04/23
Zinc (TCLP)		mg/L	0.01	EPA 6010	acc-04/23

Notes:

n.d. - Not Detected.

Respectfully Submitted

Weather Ramig/Lisa Dworak

Heather Ramig/Lisa Dworak

Client Services

The above analytical results apply only to the sample(s) submitted.

Our reports and letters are for the exclusive and confidential use of our clients and may not be reproduced in whole or in part, nor may any reference be made to the work, the results, or the company in any advertising, rews release, or other public announcements without obtaining our prior written authorization.

Dike Volumes at Jebro Inc.

From: Michael Marlow

Sent: Friday, September 04, 1998 9:33 AM

To: 'homerd@ttemi.com'

Cc: Susan Lowery

Subject: Dike Volumes at Jebro, Inc.

David,

I am listing the dike volumes and corresponding tank capacities that ar $^{\circ}$

in each dike area to help complete your inspection.

Tank Number

Tank Storage Capacity

Dike Volume

T20

83000 gals

4,193,288 gals

300 series tanks

100000 gals

492,446 gals

T18 & T29 (poly area)

17900 gals

1,012,.672 gals

T5

1,000,000 gals

2,320,633 gals

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike

ATTACHMENT F RCRIS HANDLER INFORMATION REPORT

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Identification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number:

IAD020201604

Name of Company/Installation:

Location of Installation:

City/State/Zip:

County:

JEBRO INC

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

Mailing Address: City/State/Zip:

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

Installation Contact:

Job Title: Phone Number:

Contact's Address: City/State/Zip:

Current Owner of Installation:

Owner's Address: City/State/Zip: Phone Number:

Land Type:

Owner Type:

TYPE(S) OF REGULATED ACTIVITY:

Hazardous Wastes Handled:

E 10/08/96 * N 10/08/96

WOODBURY

SUSAN LOWREY SAFETY SUPVR (712)277-8855

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

JEBRO INC

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

(712)277 - 8855

Private

Private

USED OIL FUEL MARKETER

USED OIL TRANSPORTER

USED OIL TRANSPORTER - TRANSFER FACILITY

UOIL

- Human Resource

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.

IOWA USED OIL INSPECTION JEBRO INC. IAD020201604 2303 BRIDGEPORT DRIVE SIOUX CITY, IOWA 51111

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY Region 7 Kansas City, Kansas 66101

Work Assignment Number : R07047

EPA Region : 7

Date Inspected : September 1, 1998
Date Prepared : December 11, 1998

Contract Number : 68-W4-0004

EPA Work Assignment Manager : Alma Moreno Lahm

Telephone Number : (913) 551-5232
Prepared By : Tetra Tech EM Inc.
Tetra Tech Project Manager : Andrew Mazzeo

Telephone Number : (913) 495-3940

SUMMARY OF RCRA USED OIL INSPECTION JEBRO, INC. 2303 BRIDGEPORT DRIVE SIOUX CITY, IOWA 51111 IAD020201604

Inspection Participants:

Mr. David Homer, Tetra Tech EM Inc.

Ms. Lisa Wilson, Tetra Tech EM Inc.

Mr. Michael K. Marlow, General Manager, Jebro Inc.

Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

Inspection Date:

September 1, 1998

List of Attachments:

Attachment A -- Confidential Business Information Forms

Attachment B -- Notice of Preliminary Findings

Attachment C -- Photographic Log Attachment D -- Inspection Checklists

Attachment E -- Other Supporting Documents

Attachment F -- RCRIS Handler Information Report

Submitted By:

David Homer

Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow

when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlordetect kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower that the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that its is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil-date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.

During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.

The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

ATTACHMENT A CONFIDENTIAL BUSINESS INFORMATION FORMS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CONFIDENTIALITY NOTICE

1110424211149101
Facility Name
Facility Address
2303 Bridgeport Dr. Sionx City, JA. 51111
Inspector (print)
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 Date 69/61/92
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met: 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue
to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.
Information that you claim confidential will be held as such pending a determination of applicability by EPA.
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.
Facility Representative Provided Notice (print) Signature/Date
I have received this Notice and <u>DO</u> want to make a claim of confidentiality.
Facility Representative Provided Notice (print) Susan Lowrey Susan Fourier 9-1-98
Information for which confidential treatment is requested:
Tank information - capacities, volunies, Storage, Products
Facility Photos
i.

(Rev: 4/15/98)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR DOCUMENTS AND SAMPLES

Facility Name Lovo Fuc. Facility Address 72-03 Pridgefork Dr., Slow City, TA. 51111 ocuments Collected? YES (list below) NO amples Collected? YES (list below) NO Split Samples: YES NO ocuments/Samples were: 1) Received no charge 2) Borrowed 3) Purchased_ Amount Paid: \$ Method: Cash Voucher To Be Billed_ the documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained. Receipt for the document(s) and/or sample(s) described below is hereby tecknowledged: Distributed (2) - Would of facility (sugnand tanks) Fill of (admin #18 032700 and \$032704 (pickups) from Hawkinslowshues Bill of (admin #18 032700 and \$032704 (pickups) from Hawkinslowshues Bill of (admin #18 032700 and \$032704 (pickups) from Hawkinslowshues	ור
Parility Address 72.03 Pridgefork W., Slow City, JA. 5111 Documents Collected? YES (list below) NO amples Collected? YES (list below) NO comments/Samples were: 1)Received no charge 2)Borrowed 3)Purchased_ Amount Paid: \$ Method: Cash Voucher To Be Billed_ the documents and samples described below were collected in connection with the administration and enforcement of the applicable statute under which the information is obtained. But for the document(s) and/or sample(s) described below is hereby cknowledged: Dust o (2) - Worlt of facility (sugnand tanks) **This is a series of the document of the application of the a	
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eceipt for the document(s) and/or sample(s) described below is hereby cknowledged: Dhotos (2) - Mont of faculty (signand tands) that 342 missing "used oil" placard Fill a lading #15 038700 and \$28704 (pickups) from Hawkinslowshues Bill a lading # 27423 to Frewer Construction (delivery)	_
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Bill of Lading # 27423 to Brewer Construction (delivery)	
Bill of Lading # 27423 to Brewer Construction (delivery)	· Fred
	TIC16
) tepole a Analysis of Tank # 70 from Mid west laboratous Fre- (98-210-2024 a	ind
98-225-2674)	
Depent of Analysis & Used sit stude (15 brains) for Mid west laboratories, Fre. 198	1-114
•	
Facility Representative (print) Signature/Date	7
Susan Lowrey Supanohoury 9-1-98	- 11
Daud H Ho may Daw Homen 9/1/98	
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115	

ATTACHMENT B NOTICE OF PRELIMINARY FINDINGS

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Jebro Inc.
ADDRESS: 2703 Pridgeport Drive
EPA ID NUMBER: TAUGE OF 1604 DATE: 09/01/98
EPA ID NUMBER: TADO 20201664 DATE: 09/01/98
NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which
will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.
1. Failure to label used oil tambe # 343 with the words "used oil"
2.
3.
4.
5.
6.
7.
If you have any questions regarding these findings please contact
The undersigned person hereby acknowledges receipt of a copy of this document and has read the same. Safety and
SIGNATURE: Suran Howey 9-1-98 Supervisor
This document was prepared by
Page 1 of

ATTACHMENT C
PHOTOGRAPHIC LOG

JEBRO, INC. Sioux City, Iowa

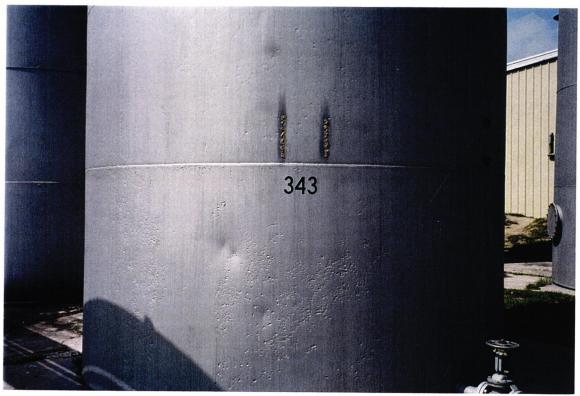


Photo No: 1 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1410 Description: Used oil tank #343 with "used oil" plackard missing.



Photo No: 2 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1446 Description: Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used

oil, the rest are asphalt.

ATTACHMENT D INSPECTION CHECKLISTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

5						
USED OIL INSPECTION FORM						
Comp		Telono	Fuc.	EPA Identification Number	TAD \$2 42 416 \$ \$	
Addr & Zip		2303	Bridgeport Dr.	Telephone Number	712-277- 8855	
& Z.,		Sioux	Bridgeport Dr.	Fax Number	712-277-8451	
Cont		Susan	Lowrey	Title Safety Sup	LIVISOY.	
Com		Michael K. Marlow & DH		General Manager	General Manager Petroleum tecorey	
Inves	tigator	David	Homer	Investigation Date	49/41/18	
At Th	nis Locat	tion Since	1972		•	
Numi	per Of E	mployees	36			
Facili	Facility Size 32.5 acres					
Busin	Business Type liquid osphalt hamufochury					
	Used Oil Management			•		
1	Describ	e How Used	Oil Filters Are Generated	5 fuel blending	gazent, and sales	
	NON	ع	to	portable asph	all plants	
2	Used Oi	l Filter Gener	ation Rate			
	not	genero	rted			

3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not cypplicable
6	List the Processes That Generate Used Oil
	no generation
	,
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
}	
3	Used Oil Generation Rate
}	not generated
1	

9	State the Number and Size of Used Oil Storage Containers and Tanks On-site & the Amount of Used Oil in Each Tank and Container Current level
	Tank 5 1000, 000 gallon capacity 5/5,928 gallons
	18 9900 gallan 5,232 gollans
	20 83,000 gallons 52,277 gallons
	29 8,000 gollons 3,562 gollons
	343 21,000 gollars 4,142 gollars
	344 17,000 gallons 14,763 gallons
	348 17,000 gallors 2,803 gallons
	347 ZO,000 gallais — Justy
	V *
10	State How Each Tank and Container Containing Used Oil Is Labeled
	343 had tabelood with "coold oril" all other tombs
	had proper labeling.
11	For Each Tank and Container Containing Used Oil That Is Not in Good Condition, Describe the Condition of the Container (Tank (Obtain Photographic Documentation)
	All tambes in good condition
	,
11a	Describe Any Secondary Containment (Obtain Photographic Documentation)
	Has secondary contaminent for all tanks, beined with
	earthen diles.

12	Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)
	to spills found at the site.
	•
13	Describe Used Oil/hazardous Waste Mixing Activities
	no mixing of hazardous waste on site.
14	Is used oil burned in on-site space heater?
	If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater, and If the Heater Combustion Gases Are Vented to the Outside
	no space heaters on site.

15	State Name. Address. Telephone Number, & E the Used Oil (Obtain Written Documentation)	Epa Identification Number of the Transporter That Picks up
Con	ll transportation is seld trans	EPA Identification Number
Add		Telephone Number
& Z	ip .	
Com	pany Name	EPA Identification Number
Add	ress	Telephone Number
& Z:	р	
16	If used oil is collected under a tolling arrangem obtain a copy of the agreement/contract.	ient.
	Not applicable	
17	Describe generator used oil self- transportatio	n activities
	In self transport ation -	facilly is a tromsporter
	of used oil. Pieles u	p from generators and
	dolivers oil to batch 7	set of plants.
		D#6 F
18	State the amount of used oil collected from do-it-	-yourseifers per month
	no collection from do-it-4	courselfens

19	State the amo	ount of used oil collected from busine	sses per month	
	1 200,00	Ogallous/month a	AMOV.	
20	If Used Oil Is Obtain a Cop Government	Collected from Other Businesses. by of the Registration/ Permit/ Licens That Allows the Company to Run a I	' e' Authorization from th Used Oil Collection Cent	er.
		ander facility- commentation is Available. Please Sta		or, fuil marketer,
21	If Used Oil Is Are Shipment	Collected from Other Businesses, ts of Greater than 55 Gailons Accept	ed?	
	If So State the	e Following for Each Such Business:	BOO autom	ers if EPA warts
	Business Name		Telephone #	the list, will have
	Address & Zia		Contact Name	aletter from GPA.
	Name		Telephone #	
	Address & Zip		Contact Name	
	Name		Telephone #	
	Address & Zip		Contact Name	
	Name		Telephone #	
	Address & Zip		Contact Name	

21a	Describe Any Hazardous Waste Generated at Facility, (Obtain Written Documentation	n) .	
•	Facility Generates the Following Quantity:		
•	Facility Appears to Be: Non hondlov.	YES	NO
	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR. Less than 100 KG/Month		
•	SMALL QUANTITY GENERATOR. More than 100 KG/Month and less than 1000 KG/Month		,
•	LARGE QUANTITY GENERATOR. More than 1000 KG / Month		
22	NOTES:		
ŀ	tas parts washers that uses dusel fuel, the fue	l is	
+	tas parts wasters that uses dused fuel, the fue ten vecycled for asphalt or knumed as fuel.		
	•		
	-		
		T.	
			۵
	÷		

7	LIST OF HANDOUTS PROVIDED TO THE FACILITY:
1 -	Assistance/Information Handout
2 ~	Used Oil Filter Study Summary/Used Oil Filters Management Information
3 ~	Copy of 40 CFR 261.(b)(13)
4 /	Iowa Waste Reduction Center Pamplet
	·

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name	Susan Lowrey	_
Signature	Swansowny	
	Date 9-1-98	

THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT BECAUSE IT WAS NOT APPLICABLE

ATTACHMENT E OTHER SUPPORTING DOCUMENTS

Date of Revision: 07-09-98

Supersedes: 05.06-92 Page 1 of 2, USED OIL

MATERIAL SAFETY DATA SHEET

Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111 EMERGENCY PHONE: Chemtrec 1 800 424-9300

PRODUCT IDENTIAL
SPECIFICATION USED OIL Product Name:

Chemical Name:

SECTION B: PHYSICAL AND CHEMICAL CHARACTERISTICS

Specific Gravity: 0.87-0.89 Solubility in Water:

Negligible
Dark brown liquid, characteristic motor oil Appearance and Odor:

SECTION C: FIRE, EXPLOSION AND REACTIVITY DATA

Pensky-Martins Closed Cup: 170-210: Flash Point: Cleveland Open Cup: 300f minimum Lower: N/A, Upper: N/A Dry chemical or foam

Flammability Limits: Extinguishing Media: NFPA Hazard Rating:

Health: 1, Fire: 2, Reactivity: 0
WARNING: Combustible liquid. Keep away from ignition sources. Use with adequate

ventilation.

Hazardous Polymerization: Will not occur

Hazardous Decomposition Incomplete combustion may produce carbon

Products: monoxide Stability: Stable

SECTION D: POTENTIAL HEALTH HAZARD & ENTRY ROUTES

Symptoms of Exposure: Headache, dizziness, nausea.

Emergency Procedures:

Eyes: Flush with clear water for 15 minutes. No significant

irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead

to irritation and/or dermatitis. Can be harmful on

prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

ingestion: If ingested, induce vemiting. Get medical attention.

This product has a variable composition. It may contain component materials tapable of producing akin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been shown to have relevance to humans.

SECTION E: PRECAUTIONS AND PROTECTION

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and bil impervious footwear when contact is likely. Use of safety glasses is good industrial practice.

Page 2 of 2, USED OIL

SECTION F:

SPILL OR LEAK PROCEDURES

Spill:

Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-8802.

Fire:

Asphalt cement will burn but is not readily ignitable.

Emergency:

Phone: Chemtrec 1 800 424-9300

SECTION G:

ADDITIONAL INFORMATION

This MATERIAL SAFETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111 Phone 712 277-8855

DATE 8-31-78 TERMINAL NO. S. C. CARRIER NO. 573 KITS CHARGENS/SNIFFER ACCURATE TANK # TANK # 344				Received, s issuance he	ubject to tariffs ar	ER BILL C	38704 OF LADING effect on date of	
CUST. P.O. NO								
EPA I.D. NO IAD020201604				Consolis	$\mathcal{L}_{j}\mathcal{A}\mathcal{E}$			
US DOT NO. 245090								
US DOT HAZMAT REG. NO. 060598 007 0	119			CUST. N	O.:			
EMERGENCY TELEPHONE NO). 1-800-42	24-9300		CONSIGNE	D TO OR SOLD		O INC.	
SHIPPING DESCRIPTION	PRODUCT	GROSS GA	L. NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT	
Gasoline, 3, UN 1203, PG II	Avgas							
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	250	250				11/4	e.
	Fuel Oil							
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene							
Other								
Other								
Other					8			
THIS IS TO CERTIFY THAT THE ABOVE NAMED MAT PACKAGED, MARKED AND LABELED, AND ARE IN PACCORDING TO THE APPLICABLE REGULATIONS CITY OF THE APPLICABLE REGULATIONS CONTROL OF THE APPLICABLE REGULATION THE GENERATOR'S REPRESENTATION. The generator hereby warrants that the material hazardous waste under RCRA. Misrepresentation financial responsibility to correct damages. SHIPPER	ROPER CONDITOR THE DEPARTMENT OF THE DEPARTMENT	ION FOR TRANS MENT OF TRANS carrier is repre	PORTATION, PORTATION. sented free of	per and carrier, ble bill of lading Classification N thereof, if carrie state shipment have been lega terms of applica- Carrier certifies	if a contract carri form described i lo. A9. MF-1 C. C. er is a common ca by common carrie	ier, or (B) the tern the National M -9, supplements arrier, provided ther in a state when a shipment shall on the supplied for the National Mark supplied f	thereto or reissue nat if this is an intere bills of lading be governed by the his shipment is a	es er-

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

DATE 8 3 - 98 TERMINAL NO. 5 44 CARRIER NO. 3/3 KITS 0 WPG 745 HALOGENS/SNIFFER 0 TERMS TANK # 344					ubject to tariffs a reof.	R BILL C	PANTUU OF LADING effect on date of
CUST. P.O. NOEPA I.D. NO IAD020201604					Lector		
US DOT NO. 245090 US DOT HAZMAT REG. NO. 060598 007 0 EMERGENCY TELEPHONE NO.		24-9300).: D TO OR SOLD	TO: JEBR	
SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	831-8037 AMOUNT
Gasoline, 3, UN 1203, PG II	Avgas						
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	400	40				NE
	Fuel Oil		T-12-7-7-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-				,
Kerosene, Combustible liquid, UN 1223, PG III	Kerosene						
Other							
Other							
Other							
THIS IS TO CERTIFY THAT THE ABOVE NAMED MAT PACKAGED, MARKED AND LABELED, AND ARE IN PACCORDING TO THE APPLICABLE REGULATIONS CONTROL OF THE APPLICABLE REGULATIONS CONTROL OF THE APPLICABLE REGULATION The generator hereby warrants that the material hazardous waste under RCRA. Misrepresentation financial responsibility to correct damages. SHIPPERCAR	ROPER CONDITION THE DEPARTM released to the n of this materia	ON FOR TRANSPOR	RTATION. RITATION. Inted free of s legal and	per and carrier, ble bill of lading Classification No thereof, if carries state shipment be have been legall terms of applica Carrier certifies	if a contract carriform described in b. A9. MF-1 C. C. is a common carrie by common carrie by prescribed, this ble bill of lading."	er, or (B) the term of the National Mo -9, supplements urrier, provided the or in a state wher is shipment shall	thereto or reissues at if this is an inter- e bills of lading be governed by the

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

MOTOR CARRIER BILL OF LADING ORIGINAL

between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor by F. G. Freund, Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment ave been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

Jebro] Inc.	MOTOR CA
This shipment shall be govern Freight Classification No. A3 No by common carrier in a state	AF-I.C.C. No. 8 issued by	F. G. Freund, Agent, supplen
INVOICE TO: Brower Constru	ation Ca	,
P.O. Box 1137	cuon co	
Sloux City, IA 5	1102	
		e e e
DESTINATION:	aminul Canal S (Fravel Pit located
		nd 2 miles east of
Ashland, NE.		
4		
MILEAGE: DELIVERY TIME:	102 19: 00	
DELIVERY DATE:	09/01/9	3
PROJECT NUMBE	A Saunders.	Co (Yutan)
		, , , , , , ,
CONTRACT NUME PURCHASE ORDE		
1 ONOTIAGE OTIBE		
CONSIGNEE: FREIGHT TYPE:	Jebro Incorpo Prepaid	orated
TIME IN:	9/1/98 14: 00	
TIME OUT:	9/1/98 14:49	
CARRIER: UNIT NUMBERS:	Michael C. Ha Milarms 98	Jebz04
Carrier certifies that the ca	commodity as describe	this shipment is a proper c ed by this shipper and tha

arms (Jeb204 r this shipment is a proper container

bed by this shipper and that proper placards have been applied. I hereby certify that the maximum legal weight for the vehicle transporting the goods described above is: DRIVER Arrival Time: Uniosding Began CUSTOMERX Unloading Complete Pump Used or Ordered Reason for Delay Customer Signature

PRODUCT INFORMATION Combustible Liquid, n.o.s., NA 1993, PG III

Chemtrec: 1-800-424-9300 Jebro: 1-899-831-8037

Burner Fuel

SP.G.: 0.8870

7.3860 lb/gal: kg/lit: Temp 174 F; 79 Temp adi 0.95550 **EMERGENCY CONTACT: 1-712-277-8855**

Gross Lbs	76,500	(34,790	kg
Tare Lbs	29,860	-	13,544	kg)
Net Lbs	46,640	(21,156	kg j
Net Tons	23.32	- (21.16	Mg)
Net Galions @69F	6,315	1	23,905	1)
Project# STPE-3425	(3)			
regulative was as we were				

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

TEMPERATURE FOR K	INEMATIC VISCOSITY OF:	
300 Cs ≈	0	
150 Cs =	0	
200 Cs =	6	
50 Cs =	0	
SEAL NUMBERS:		

CERTIFICATE OF COMPLIANCE

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of Mobraska

The transport tank was examined and found suitable for loading.

SHIPPER: JEBRO INC.

SUPPLIER AUTHORIZED REP. & WEIGHER

Need: "Fumo"

Terminal: Sloux City. IA Bill of Lading Number:

22423



Report Number 98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 08/13/98 Date Received: 08/04/98

Mail to:

JEBRO INC PO/Proj. #: 2596
TANK 20

2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001

Lab number: 412909

Sample ID: ID #83

	Level	Detection	Analyst-
Analysis	Found Units	Limit Method	Date
Total halogens	0.05 %	0.02 ASTM D1317-118	jjd-08/05
Arsenic (dissolved)	n.d. mg/kg	5.0 EPA 6010	pmd-08/13
Cadmium (dissolved)	1.28 mg/kg	0.05 EPA 6010	pmd-08/13
Lead (dissolved)	24.4 mg/kg	0.5 EPA 6010	pmd-08/13
Chromium (dissolved)	$1.6 \mathrm{mg/kg}$	0.1 EPA 6010	pmd-08/13
Ignitability	218 deg F	39 ASTM D93	jjd-08/07

Notes:

n.d. - Not Detected.

Respectfully Submitted

Heather Ramig Client Services

7.387 380



Report Number 98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 07/29/98 Date Received: 07/08/98

Mail to:

JEBRO INC 2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001

PO/Proj. #: 2567 TÄNK 20

Lab number: 408025

Sample ID: ID #82

	Level		Detection		Analyst-
Analysis	Found	Units	Limit N	lethod	Date
Total halogens	0.04	%	0.01 A	STM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d.	mg/kg	5.0 E	PA 6010	prnd-07/28
Cadmium (dissolved)		mg/kg	0.05 E	PA 6010	pmd-07/28
Lead (dissolved)	27.3	mg/kg	0.5 E	PA 6010	pmd-07/28
Chromium (dissolved)	1.6	mg/kg	0.1 E	PA 6010	pind-07/28
Ignitability		deg F	39 A	STM D93	jjd-07/15

Notes:

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040.

Respectfully Submitted

deather Rank

Heather Ramig Client Services

7.375



Report Number 96-114-2036

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121 **REPORT OF ANALYSIS**

For: (7691) JEBRO INC (712)277-8855

Date Reported: 04/23/96

Date Received: 04/18/96

Mail to:

JEBRO INC

2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001 PO/Proj. #: 436139

USED OIL SLUDGE ANALYSIS - STRAINER

Sample ID: TANK 38 ID # TCLP Lab number: 295669

Analysis Arsenic (TCLP) Barium (TCLP) Mercury (TCLP) Selenium (TCLP) Silver (TCLP) Chromium (TCLP) Lead (TCLP) Cadmium (TCLP) Nickel (TCLP)	Level Found n.d. n 0.75 n n.d. n n.d. n 0.04 n 0.05 n 0.01 n 0.03 n	mg/L 0.5 mg/L 0.005 mg/L 0.0002 mg/L 0.10 mg/L 0.01 mg/L 0.01 mg/L 0.05 mg/L 0.05 mg/L 0.05 mg/L 0.05	Method EPA 6010 EPA 6010 EPA 7470 EPA 6010 EPA 6010 EPA 6010 EPA 6010 EPA 6010 EPA 6010	Analyst- Date acc-04/23
Nickel (TCLP) Copper (TCLP) Zinc (TCLP)	0.03 ii 0.03 ii 35.0 ii	mg/L 0.01	EPA 6010 EPA 6010	

Notes:

n.d. - Not Detected.

Respectfully Submitted

Heather Ramig Heather Ramig/Lisa Dworak

Client Services

From: Michael Marlow

Sent: Friday, September 04, 1998 9:33 AM

To: 'homerd@ttemi.com'

Cc: Susan Lowery

Subject: Dike Volumes at Jebro, Inc.

David,

4.

I am listing the dike volumes and corresponding tank capacities that ar $\ensuremath{\mathrm{e}}$

in each dike area to help complete your inspection.

Tank Number

Tank Storage Capacity

Dike Volume

T20

83000 gals

4,193,288 gals

300 series tanks

100000 gals

492,446 gals

T18 & T29 (poly area)

17900 gals

1,012,.672 gals

T5

1,000,000 gals

2,320,633 gals

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike

ATTACHMENT F RCRIS HANDLER INFORMATION REPORT

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Identification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, telephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or simply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

Your cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number:

IAD020201604

Name of Company/Installation:

JEBRO INC

Location of Installation:

2303 BRIDGEPORT DR

City/State/Zip:

SIOUX CITY, IA 51111

County:

WOODBURY

Mailing Address: City/State/Zip:

2303 BRIDGEPORT DR

SIOUX CITY, IA 51111

Installation Contact:

SUSAN LOWREY

Job Title:

SAFETY SUPVR

Phone Number:

(712)277 - 8855

Contact's Address:

2303 BRIDGEPORT DR

City/State/Zip:

SIOUX CITY, IA 51111

Current Owner of Installation:

TYPE(S) OF REGULATED ACTIVITY:

JEBRO INC

Owner's Address:

2303 BRIDGEPORT DR

City/State/Zip:

SIOUX CITY, IA 51111

Phone Number:

(712)277-8855

Land Type:

Private

Owner Type:

Private

USED OIL FUEL MARKETER

USED OIL TRANSPORTER

USED OIL TRANSPORTER - TRANSFER FACILITY

Hazardous Wastes Handled:

UOIL

E 10/08/96 N 10/08/96

All information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is determined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or submittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.

FEB 0 4 1999

MEMORANDUM

SUBJECT:

Transmittal of Used Oil Inspection Report - RCRA

FROM:

Alma Moreno Lahm

Environmental Engineer, ENSV/ARCM

TO:

Jo Ann Heiman

Chief, RESP/ARTD

This memorandum transmits the following Used Oil Inspection report performed under a work assignment managed by the Environmental Services Division, Air & RCRA Compliance Branch.

Facility EPA ID Number Date of Inspection

Jebro Inc. IAD030301604 September 1, 1998

2303 Bridgeport Drive Sioux City, IA 51111

Attachments

ENSV:ARCM:C:\USER\AMORENO\09RO7047\RPTTRSTD.MEM:JEBROINC.IAD.RPT:AML:8JAN99

ARCM

MORENO LAHM

Amsden 1/19/99



U.S. Environmental Protection Agency Contract No. 68-W4-0004



RCRA Enforcement, Permitting, and Assistance Contract–EPA Zone III



Tetra Tech EM Inc.

RCRA CBI Confidential



IOWA USED OIL INSPECTION JEBRO INC. IAD020201604 2303 BRIDGEPORT DRIVE SIOUX CITY, IOWA 51111

Prepared for:

U.S. ENVIRONMENTAL PROTECTION AGENCY Region 7 Kansas City, Kansas 66101

Work Assignment Number

: R07047

EPA Region

: 7

Date Inspected

: September 1, 1998

Date Prepared

: December 11, 1998

Contract Number

: 68-W4-0004

EPA Work Assignment Manager

: Alma Moreno Lahm

Telephone Number

: (913) 551-5232

Prepared By

: Tetra Tech EM Inc.

Tetra Tech Project Manager

: Andrew Mazzeo

Telephone Number

: (913) 495-3940

DEC 3 1 1998

RECEIVED

ARCM/ENSV



SUMMARY OF RCRA USED OIL INSPECTION JEBRO, INC. 2303 BRIDGEPORT DRIVE SIOUX CITY, IOWA 51111 IAD020201604

Inspection Participants:

Mr. David Homer, Tetra Tech EM Inc.

Ms. Lisa Wilson, Tetra Tech EM Inc.

Mr. Michael K. Marlow, General Manager, Jebro Inc. Ms. Susan Lowery, Safety Supervisor, Jebro Inc.

Inspection Date:

September 1, 1998

List of Attachments:

Attachment A -- Confidential Business Information Forms

Attachment B -- Notice of Preliminary Findings

Attachment C -- Photographic Log Attachment D -- Inspection Checklists

Attachment E -- Other Supporting Documents

Attachment F -- RCRIS Handler Information Report

Submitted By:

David Homer

Environmental Toxicologist

The Tetra Tech inspection team inspected the Jebro Inc. (Jebro) facility on September 1, 1998, as a used oil transporter, transfer facility, processor, and fuel marketer. The team used the used oil inspection form (Attachment D) as a basis for the inspection. The form, however, does not cover the complete requirements for a used oil transporter, processor, and fuel marketer. The purpose of this summary is to provide additional information on Jebro's activities as a transporter, processor, and fuel marketer, and should be viewed as a supplement to the used oil inspection form.

The inspection began at 13:00 with introductions and I explained the purpose of the inspection and the authority to conduct this inspection. I reviewed the facilities right to claim information as business confidential, during the inspection information was claimed as business confidential by Mr. Michael Marlow, General Manager. The information claimed as confidential is the data on the number of tanks at the facility, their capacity, and any pictures of the facility. The inspection consisted of a review of the activities at the site, a site tour, and a review of relevant electronic records and other documents.

Mr. Marlow stated that Jebro's main operation is liquid asphalt manufacturing. He stated that used oil is used in various portions of the asphalt manufacturing process; it is blended with heavier asphalt to make a lighter product, used as fuel at the plant, and sold as a fuel to asphalt batch plants.

Mr. Marlow stated Jebro, as a transporter, collects used oil from over 800 locations in Iowa, Nebraska, and South Dakota. Since Jebro is a transporter, they are subject to the requirements of 40 Code of Federal Regulations (CFR) 279 Subpart E. To meet these requirements, Jebro submitted a notification of hazardous waste activity form to the Environmental Protection Agency (EPA) on October 8, 1996 and received an EPA hazardous waste ID No. IAD020201604. Mr. Marlow explained that all used oil is transported to its facility in Sioux City, Iowa. Jebro has established procedures the drivers must follow



when accepting used oil for shipment to its facility. These procedures, as described by Mr. Marlow, are presented in the following paragraph.

The Jebro drivers are responsible for evaluating the used oil at pick up. They use their knowledge of clients' processes and an electronic sniffer to check for light end products. If the used oil fails the sniffer test, then the driver uses a chlordetect kit to check for halogens. If the used oil fails this test, it is not picked up, and the driver leaves the bill of lading, unless the client provides a full chemical analysis to verify that the used oil is lower that the 1,000 parts per million (ppm) halogen limit. This procedure is meant to ensure compliance with 40 CFR 279.44. Mr. Marlow stated that Jebro keeps a hard copy of the bill of lading for each shipment for at least 3 years. Jebro maintains an electronic data base of the information from the bills of lading that date back to 1989. I reviewed a number of these bills of lading and found them in compliance with 40 CFR 279.46. The bills of lading identify the date of shipment, the generator of the used oil, and the volume of used oil accepted. During the inspection I did not observe any bills of lading that had a full chemical analysis attached supporting its compliance with the 1,000 ppm halogen limit. Mr. Marlow stated that its is very rare that supporting documentation would be provided.

Mr. Marlow explained once the used oil arrives at the facility it is unloaded into the 300 series tanks. There are 4 tanks in this series and the capacity of each tank is given below.

Tank No. 343	21,000 gallons
Tank No. 344	17,000 gallons
Tank No. 347	20,000 gallons
Tank No. 348	17,000 gallons

Mr. Marlow stated that all these tanks are connected via piping and pumps to allow for oil to be moved between the various tanks as needed. The oil from the 300 series tanks is pumped to Tank No. 20 the main supply tank and kept at 160 °F in order for the oil to be atomized in burners. Once a month, the content of this tank is sampled to determine whether the used oil meets specifications (40 CFR 279.11). Midwest Laboratory, Omaha, Nebraska, performs the analytical tests on the oil. The oil from Tank No. 20 is either piped to on-site boilers or to racks for shipment off site for use in asphalt batch plants. Jebro maintains a computer data base that tracks each off-site shipment of used oil. I reviewed the data base and found that it contains the following information on each shipment of used oil-date of shipment, destination of the shipment, volume of used oil shipped, and an analysis certification number. Mr. Marlow stated that each analysis is given a certification number and Jebro assigns the appropriate analysis certification number for each used oil shipment. The data base cross references the used oil shipments to the monthly analysis of used oil from Tank No. 20 by certification number. Mr. Marlow stated that oil from Tank No. 20 is also pumped to Tanks No. 15, 18, and 29 for on-site storage prior to burning in heaters or boilers. Tank No. 18 is the supply tank for hot oil heater in the "poly area."

Jebro acts as a used oil processor through its blending of used oil with asphalt to obtain the necessary job specifications. As noted earlier, Jebro has notified as a processor. Jebro is required to meet the general facility standards, 40 CFR 279.52. I reviewed the operation plan for the facility and observed the operation during the visual inspection of the facility. I found that the facility was operated and maintained in a manner to minimize releases and explosions as required in 40 CFR 279.52(a)(1). During the visual inspection I observed that the facility had the specific equipment and communications devices required in 40 CFR 279.52(a)(2)(3) and (4). No deficiencies were noted during the inspection.

During the visual inspection, I observed that there was adequate space between all tanks on site to meet the requirements of 40 CFR 279.52(a)(5). Mr. Marlow stated that the facility is inspected by the fire department at least once a year. During the inspection the fire department is briefed on materials handled, layout of the facility, and evacuation routes as required in 40 CFR 279.52(a)(6).

I reviewed the facility's contingency plan for compliance with 40 CFR 279.52(b) and no deficiencies were noted.

40 CFR 279.53 requires that Jebro provide information on the halogen content of the used oil. As explained earlier, Mr. Marlow stated Jebro samples Tank No. 20 once per month to ensure that the used oil meets the specifications. I reviewed the electronic data base and several analytical reports and did not identify any halogen concentrations greater than 1,000 ppm, confirming that the used oil is not a hazardous waste.

Used oil management requirements are outlined in 40 CFR 279.54. Mr. Marlow stated that Jebro stores all used oil in tanks at its facility, no containers are used and that all tanks are located in areas with secondary containment. I confirmed this information during the visual site inspection. Tetra Tech received a follow-up e-mail from Jebro on September 4, 1998 providing information on the volumes of the tanks and of the secondary containment areas for each tank (Attachment E). The message also stated that all secondary containment areas were constructed with 2 feet of compacted clay. I reviewed this information and found no deficiencies with the requirements.

As part of the inspection, I reviewed the site analysis plan, tracking system, and operating record. No deficiencies were noted with the requirements in 40 CFR 279.55, 279.56, 279.57, 279.58, and 279.59.

Jebro notified EPA that it acts as a used oil fuel marketer. Mr. Marlow stated that Jebro sells used oil as a fuel to be used in batch asphalt plants. Jebro, as described earlier, maintains an electronic database which tracks all off-site shipments of used oil and the associated certification number corresponding to appropriate the laboratory analysis performed on a sample from Tank 20, the supply tank. Mr. Marlow stated that Jebro does not provide a certification of oil quality with each shipment, although Jebro markets the oil as specification used oil. According to 40 CFR 279.61(a)(1) facilities that meet the definition of an industrial furnace are allowed to burn off-specification used oil. Mr. Marlow stated that the batch asphalt plants meet the definition of industrial furnace and the batch plants are able to accept and burn off-specification oil.

Subsequent to the inspection, Tetra Tech requested a material safety data sheet (MSDS) on the used oil that is sold for off-site use. Mr. Marlow faxed a copy of the MSDS (see Attachment E) to Tetra Tech on October 13, 1998, stating that the oil is marketed as "specification used oil."

I reviewed Jebro's notification form and shipment tracking data base for the used marketer requirements, 40 CFR 279.7 Subpart H. No deficiencies were noted during the inspection.

The inspection also included the completion of the used oil inspection form. It should be noted that the form requests the name and address of all facilities that use Jebro as a transporter of used oil. Mr. Marlow stated that this information is considered business confidential, and Jebro would supply the information directly to EPA, if requested in writing.

The inspection concluded with a discussion of the notice of preliminary findings of the inspection (see Attachment 2). The only violation noted was that Tank No. 343 was not labeled with the words "used oil" as required by 40 CFR 279.54(f). A global positioning reading was taken at the facility and the inspection concluded at 1500.

ATTACHMENT A CONFIDENTIAL BUSINESS INFORMATION FORMS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY CONFIDENTIALITY NOTICE

CONFIDENTIALITY NOTICE IADUZOZOILO 04
Facility Name
Jebro Jac.
P 22 A 11
1303 Bridge port Dr., Sionx City, JA. 51111 Inspector (print) David Homer
Inspector (print)
David Homer
U.S.EPA, Region VII, ENSV Division, 25 Funston Road, Kansas City, KS 66115 Date 49/61/98
The United States Environmental Protection Agency (EPA) is obligated, under the Freedom of Information Act, to release information collected during inspections to persons who submit requests for that information. The Freedom of Information Act does, however, have provisions that allow EPA to withhold certain confidential business information from public disclosure. To claim protection for information gathered during this inspection you must request that the information be held CONFIDENTIAL and substantiate your claim in writing by demonstrating that the information meets the requirements in 40 CFR 2, Subpart B. The following criteria in Subpart B must be met:
1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. No statute specifically requires disclosure of the information.
3. Disclosure of the information would cause substantial harm to your company's competitive position.
Information that you claim confidential will be held as such pending a determination of applicability by EPA.
I have received this Notice and <u>DO NOT</u> want to make a claim of confidentiality at this time.
Facility Representative Provided Notice (print) Signature/Date
I have received this Notice and DO want to make a claim of confidentiality.
Facility Representative Provided Notice (print) Susan Lowrey Susan Howley 9-1-98
Information for which confidential treatment is requested:
Tank information - capacities, volumes, Storage, Products
Facility Photos

(Rev: 4/15/98)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY RECEIPT FOR DOCUMENTS AND SAMPLES

		HOPOLIZOUMON
Facility Name Jelovo Fne.		
Facility Address 7203 Bridgeport Dr.	, Sionx City, I	A.5111
ocuments Collected? YES (list bel	ow) NO	
amples Collected? YES (list below) NO Split	Samples: YES NO
ocuments/Samples were: 1)Received no	charge2)Born	rowed 3)Purchased
Amount Paid: \$ Met	hod: Cash Vouc	cher To Be Billed
he documents and samples described be the administration and enforcement of information is obtained.	elow were collecte the applicable st	ed in connection with tatute under which the
:======================================	=======================================	
Receipt for the document(s) and/or sancknowledged:	mple(s) described	below is hereby
Dhotos (2) - Stout of facility	(signand tank	ج)
tul#21/2	Curchell Dlage	(
Pill a) lading #15 038700 and 0	38704 (picku	eps) from Hawkins Construct
Bill of Lating # 27423 to Brewer	Construction (deliver	en,)
I teperte a Analysis of Tank # 70 from !		
· · · · · · · · · · · · · · · · · · ·		98-225-2014)
1) Depent of Analysis of Used oil studects	shacing) for Utid	west laborativies Fre. 198
· · · · · ·		y
		g 2 g 2
		e - 5
Facility Representative (print)	Signature/Date	^
Susan Lowrey	Suparonour	4-1-98
Inspector (print) David H Ho mey	Signature/Date	mer 5/1/98
U.S.EPA, Region VII, ENSV Division, 25 Funston Ro	pad, Kansas City, KS 6611	15
(rev:1/20/93)		

ATTACHMENT B

NOTICE OF PRELIMINARY FINDINGS

NOTICE OF PRELIMINARY FINDINGS

FACILITY NAME: Jebro Jac. ADDRESS: 2702 Prictaeport Drive GIONX City 17A, 51111 EPA ID NUMBER: TAOU 2020 1604 DATE: 09/01/98
NOTICE: I am not an employee of the Environmental Protection Agency ("EPA"). I am a contractor for EPA retained to conduct compliance evaluation inspections. The following is a list of observations/recommendations found during this inspection which will be reported back to EPA. This is not to be construed as a complete list of observations/recommendations. The EPA will be evaluating the report prepared as a result of this inspection and making the determinations as to what violations may have occurred at your facility.
1. Failure to label used oil tambe # 343 with the words "used oil" 2.
4
6. 7.
If you have any questions regarding these findings please contact
of this document and has read the same. Safety and PRINTED NAME: Susan Lowey TITLE: Human Resource
This document was prepared by Druid Howev
Page 1 of

ATTACHMENT C
PHOTOGRAPHIC LOG

JEBRO, INC. Sioux City, Iowa



Photo No: 1 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1410 Description: Used oil tank #343 with "used oil" plackard missing.



Photo No: 2 Direction Facing: Northwest Photographer: Lisa K. Wilson

Date: 09/01/98, 1446 Description: Sign and tanks as viewed from entrance of parking lot on Bridgeport; silver tank #5 is used oil, the rest are asphalt.

ATTACHMENT D

INSPECTION CHECKLISTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

		USED OIL INSPE	ECTION FOR	M
Company Name	Telono	Fnc.	EPA Identification Number	TAD \$2 \$2 \$16\$ \$4
Address	2303	Bridgeport Dr.	Telephone Number	712-277- 8855
& Zip	Sioux	Bridgeport br.	Fax Number	712-277-8451
Company.	ł	Lowrey	Title Safety Supe	'I VISOY.
Contact	Michae	e K. Malon & DA		Petrokum tecorey
Investigator	David	Homer	Investigation Date	49/41/18
At This Loca	tion Since	1972		
Number Of E	.mployees	36		
Facility Size		32.5 acres		,
Business Type		liquid osphalt	- Manufostu	iú
Used Oil Management Activities Ptologe used oit transporter, storage, beur		torage, berned		
1 Descri	be How Used	Oil Filters Are Generated 05	fuel toleration	agent, and sales
non	ف	to	portable asph	all plants
				·

	il Filter Gener	ration Rate		
not	genero	red	***************************************	`
			1	

3	Describe How Used Oil Filters Are Drained & Managed On-site (Obtain Photographic Documentation)
	not applicable
	•
4	How & Where Are Used Oil Filters Disposed Of? (Obtain Written Documentation)
	not applicable
5	Amount of Used Oil Filters On-site
	not cypplicable
6	List the Processes That Generate Used Oil
	no genuation
7	Describe How the Used Oil Generated from Each Process Is Managed On-site
	no generation
	V - VOT Communica Para
3	Used Oil Generation Rate
	not generated

9	State the Number and Size of Used Oil Storage Containers and Tanks On-site & the Amount of Used Oil in Each Tank and Container Current level
	Tank 5 1000,000 gallon capacity 5/5,928 gallons
	18 9,900 gallan 5,232 gallag
	20 83,000 gallons 52,277 gallons
	29 8,000 gollons 3,562 gollons
	343 21,000 gollars 4,142 gollaris
	344 17,000 gallons 14,763 gallons
	348 17,000 gallors 2,803 gallors
	347 ZO,000 gallais — austy
	1
10	State How Each Tank and Container Containing Used Oil Is Labeled ~
	3:13 not labeled with "coald oil" all other tomks
	had proper labeling.
11	For Each Tank and Container Containing Used Oil That Is Not in Good Condition. Describe the Condition of the Container /Tank (Obtain Photographic Documentation)
	41 tanks in good condition
112	Describe Any Secondary Containment (Obtain Photographic Documentation)
	Has secondary contaminent for all tanks, beined with
	earthen diles.

12	Describe Any Used Oil Spills or Staining Found On-site (Obtain Photographic Documentation)
	no spills found at the site.
-	Describe Used Oil/hazardous Waste Mixing Activities
13	
	no mixing of hazardous waste on site.
2	
14	Is used oil burned in on-site space heater?
	If So State How Much Used Oil Is Burned per Year, the Design Capacity of the Space Heater. and If the Heater Combustion Gases Are Vented to the Outside
	no space heaters on site.

15	State Name. Address. Telephone Number. & Epa Identification Number of the Transporter That Picks up the Used Oil (Obtain Written Documentation)		
Com	ll transportation is seld trans	EPA Identification Number	
Add		Telephone Number	
& Z	ip		
Соп	apany Name	EPA Identification Number	
Add	ress	Telephone Number	
& Z	îp		
16	If used oil is collected under a tolling arrangem obtain a copy of the agreement/contract.	ent.	
	Not applicable		
17	Describe generator used oil self- transportation	n activities	
	of used oil. Pieles up from generators and delivers coil to batch poton plants.		
	of used oil. Pieles u	p tron generators and	
	delivers ont to batch ?	Dt plants.	
		· ·	
18	State the amount of used oil collected from do-it-		
	no collection from do-it-y	ourselfers	

19	State the	amount of used oil collected from businesses p	er month	
	1 200,	OCC gallons/month app	W.	
20	If Used O Obtain a Government	il Is Collected from Other Businesses. Copy of the Registration/ Permit/ License/ Au ent That Allows the Company to Run a Used (thorization from t Oil Collection Cen	ter.
	Has in	transfer lacility-	7/ general	er, ful marketer,
	If No Suci	n Documentation Is Available. Please State Su	ch:	
				•
21	If Used Oi Are Shipr	I Is Collected from Other Businesses, nents of Greater than 55 Gailons Accepted?		
	402			
	If So State	e the Following for Each Such Business:	300 Cuitorm	we if EPA works
	Business Name		Telephone #	It reguested in war
	Address & Zio		Contact Name	aletter from EPA.
	Name		Telephone #	
	Address & Zip		Contact Name	
-	Name		Telephone #	
. [Address & Zip		Contact Name	
	Name		Telephone #	
	Address & Zip		Contact Name	

21a	Describe Any Hazardous Waste Generated at Facility, (Obtain Written Documentation	on)	
•	Facility Generates the Following Quantity:		
	Facility Appears to Be:	YES	NO
	CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR. Less than 100 KG/Month		
	SMALL QUANTITY GENERATOR. More than 100 KG/Month and less than 1000 KG/Month		,
•	LARGE QUANTITY GENERATOR, More than 1000 KG / Month		
22	NOTES:	٠	g.
1	tas parts wasters that uses dusel fuel the fue	lis	
1	tas parts wasters that uses dusal Enel, the fue hen recycled for asphalt or burned as fuel.		
	The state of the s	120	
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		п	
		a a	
			5
			-
			0 0
			- 1
		Til.	

1 3		
		LIST OF HANDOUTS PROVIDED TO THE FACILITY:
	/	Assistance/Information Handout
1 2		Used Oil Filter Study Summary/Used Oil Filters Management Information
3	/	Copy of 40 CFR 261.(b)(13)
4	/	Iowa Waste Reduction Center Pamplet
,		
		·
ľ		
_		

I have read the above information, which was provided to the investigator. I certify that such information is true, accurate, and complete. I am aware that providing false information to the government is a criminal offense and that I can be fined and or imprisoned for doing so.

Printed Name	Susan Lowrey	
Signature	Swansowny	_
	Date 9-1-98	

at and chusedoil.796

THERE IS NO CFC CHECKLIST INCLUDED IN THIS REPORT BECAUSE IT WAS NOT APPLICABLE

ATTACHMENT E OTHER SUPPORTING DOCUMENTS

Date of Revision: 07-09-98

Supersedes: 05.06-92 Page 1 of 2, USED OIL

MATERIAL SAFETY DATA SHEET

Jebro Inc., 2303 Bridgeport Dr., Sioux City, IA 51111 EMERGENCY PHONE: Chemtrec 1 800 424-9300

PRODUCT IDENTITY SECTION A:

Product Name: SPECIFICATION USED OIL

Chemical Name: Oils, used engine

PHYSICAL AND CHEMICAL CHARACTERISTICS SECTION B:

Specific Gravity: 0.87-0.89 Solubility in Water: Negligible

Appearance and Odor: Dark brown liquid, characteristic motor oil

odor

SECTION C: FIRE, EXPLOSION AND REACTIVITY DATA

Pensky-Martins Closed Cup: 170-2105 Flash Point:

Cleveland Open Cup: 300F minimum

Lower: N/A, Upper: N/A Dry chemical o: foam Flammability Limits:

Extinguishing Media:

Health: 1, Fire: 2, Reactivity: 0
WARNING: Combustible liquid. Keep away NFPA Hazard Rating:

from ignition sources. Use with adequate

ventilation. Will not occur

Hazardous Polymerization:

Hazardous Decomposition

Incomplete combustion may produce carbon monoxide

Products: Stability: Stable

SECTION D: POTENTIAL HEALTH HAZARD & ENTRY ROUTES

Symptoms of Exposure: Headache, dizziness, nausea.

Emergency Procedures:

Eyes: Flush with clear water for 15 minutes. No significant

irritation expected.

Skin: Prolonged or repeated contact can defat the skin and lead

to irritation and/or dermatitis. Can be harmful on

prolonged or repeated skin contact.

Inhalation: Avoid generation and inhalation of mists.

ingestion: If ingested, induce vomiting. Get medical attention.

This product has a variable composition. It may contain component materials rapable of producing akin cancer with varying degrees of potency in laboratory animals following frequent skin applications. This research has not been shown to have relevance to humans.

SECTION E: PRECAUTIONS AND PROTECTION

Avoid skin contact. Wear gloves. Wear protective clothing, gloves and bil impervious footwear when contact is likely. Use of safety glasses is good

indusprial practice.

Page 2 of 2, USED OIL

SECTION F:

SPILL OR LEAK PROCEDURES

Spill:

Recover free product. Add sand, clay, soil or other suitable absorbent to soak up material. Minimize skin contact. Keep spill from spreading into sewers or waterways by diking. Report spills onto navigable waterways to: National Response Center: 1 800 424-8802.

Fire:

Asphalt cement will burn but is not readily ignitable.

Emergency:

Phone: Chemtrec 1 800 424-9300

SECTION G:

ADDITIONAL INFORMATION

This MATERIAL SAFETY DATA SHEET and the information it contains is presented as accurate, complete and reliable to the best of Jebro Inc.'s knowledge and belief. Jebro Inc. does not warrant or guarantee this information and shall not be liable for any loss or damages arising out of the use thereof. It is the responsibility of each individual user to satisfy itself that the information presented in this document is suitable and complete for its particular use.

Prepared by: Jebro, Inc., 2303 Bridgeport Drive, Sioux City, IA 51111 Phone 712 277-8855

TERMINAL NO. S.G. TERMINAL NO.						ER BILL O		IG
3 DOT NO. 245090	110			OUGT N	.			
US DOT HAZMAT REG. NO. 060598 007 0		24-9300			D.:	TO: JEBR	O INC.	2
SHIPPING DESCRIPTION	PRODUCT	GROSS GA	AL. NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUN	T
asoline, 3, UN 1203, PG II	Avgas							
Combustible liquid, n.o.s., NA 1993, PG III	Used Oil	250	250				11/4	
	Fuel Oil							
rosene, Combustible liquid, UN 1223, PG III	Kerosene				6			
Other								
her								
her	9				<i>y</i>			
THIS IS TO CERTIFY THAT THE ABOVE NAMED MAT CKAGED, MARKED AND LABELED, AND ARE IN FICORDING TO THE APPLICABLE REGULATIONS CONSTRUCTION OF THE APPLICABLE REGULATIONS OF THE APPLICABLE REGULATION OF THE APPLICABLE REGULA	released to the of this material	carrier is represal is the general	SPORTATION, SPORTATION. esented free of ator's legal and	per and carrier, ble bill of lading Classification N thereof, if carrie state shipment have been lega terms of applica Carrier certifies proper containe	if a contract carr form described it o. A9. MF-1 C. C. er is a common carri- by common carri- lly prescribed, thi able bill of lading. that the cargo ta	d by (A) the contrier, or (B) the term in the National Mc-9, supplements tarrier, provided their in a state where is shipment shall the contribution of the supplied for the dity as described in the contribution of the contribu	ns of the applic stor Freight thereto or reissi at if this is an ir e bills of lading be governed by is shipment is a	ues nter- the

-2G 745	_TANK #	SNIFFER OF)	Received, stringstance here.	Appendix	ER BILL (nd/or contract in	DS 8700 OF LADING effect on date of
					D.:		
EMERGENCY TELEPHONE NO). 1-800-42	4-9300		CONSIGNE	TO OR SOLD	TO: JEBR	O INC. 831-8037
SHIPPING DESCRIPTION	PRODUCT	GROSS GAL.	NET GAL.	ADJ. GAL.	WATER	PRICE	AMOUNT
isoline, 3, UN 1203, PG II	Avgas						
mbustible liquid, n.o.s., NA 1993, PG III	Used Oil	400	20				NE
4	Fuel Oil						
rosene, Combustible liquid, UN 1223, PG III	Kerosene						
ner					8		
Other					11		
ner							
IS IS TO CERTIFY THAT THE ABOVE NAMED MAT PACKAGED, MARKED AND LABELED, AND ARE IN P CORDING TO THE APPLICABLE REGULATIONS CONTINUE IN THE SECONDARY IN THE SEC	ROPER CONDITION F THE DEPARTMENT released to the condition of this material	ON FOR TRANSPO ENT OF TRANSPO carrier is represe is the generator	ORTATION. RETATION.	per and carrier, ble bill of lading Classification No thereof, if carrier state shipment be have been legall terms of applica Carrier certifies	if a contract carr form described it b. A9. MF-1 C. C. is a common carri by common carri by prescribed, thi ble bill of lading.	ier, or (B) the ter n the National M -9, supplements arrier, provided the er in a state whe s shipment shall	thereto or reissues nat if this is an inter- re bills of lading be governed by the his shipment is a

1 - OFFICE • 2 - DRIVER • 3 - CUSTOMER

P I Inc

MOTOR CARRIER BILL OF LADING ORIGINAL

shipment shall be governed by (a) the contract between shipper and carrier, if carrier is a contract carrier; or (b) the terms of applicable bill of lading form described in National Motor Freight Classification No. A3 MF-I.C.C. No. 8 issued by F. G. Freund. Agent, supplements thereto or reissues thereof, if carrier is a common carrier, provided that, if this is an intrastate shipment ommon carrier in a state where bills of lading have been legally prescribed, this shipment shall be governed by the terms of the applicable bill of lading.

IVOICE TO: **Frower Construction Co** P.O. Box 1137 loux City, IA 51102

ESTINATION: Jeliver to the Central Sand & Gravel Pit located approximately 6 miles north and 2 miles east of Ashland. NE.

1ILEAGE:

102 19:00

ELIVERY TIME: **DELIVERY DATE:**

09/01/98

ROJECT NUMBER: Saunders, Co. - (Yutan)

CONTRACT NUMBER:

988074

URCHASE ORDER #:

CONSIGNEE:

Jebro Incorporated

REIGHT TYPE:

Prepaid

IME IN:

9/1/98 14:00 9/1/98 14:49

TIME OUT: CARRIER:

Michael C. Harms

JNIT NUMBERS:

MHarms96 /Jeb204

Carrier certifies that the cargo tank supplied for this shipment is a proper container transportation of this commodity as described by this shipper and that proper acards have been applied.

I hereby certify that the maximum legal weight for the vehicle transporting the

ods	described	above	IS:_

Arrival Time: Uniosding Began

CUSTOMERX

Unloading Complete: Pump Used or Ordered Reason for Delay

Customer Signature

PRODUCT INFORMATION

Combustible Liquid, n.o.s., NA 1993, PG III

Chemtrec: 1-890-424-9308

Jebro: 1-899-831-8937 **Burner Fuel**

SP.G.:

0.8870

7.3860 lb/gal:

kg/lit:

0.8850

21.16 Ma)

23.905 11

Temp 174 F: 79

0.95550 Temp adi

EMERGENCY CONTACT: 1-712-277-8855

LOAD WEIGHTS AND QUANTITIES

76.500 34.790 kg | Gross Lbs 29,860 13,544 kg l Tare Lbs Net Lbs 48,640 21,156 kg i

Net Tons 23.32 Not Gallons @69F 6.315

Project# STPE-3425(3)

This is to certify that the above named articles are properly described, and are packed and marked and are in proper condition for transportation according to the regulations by the Interstate Commerce Commission.

TEMPERATURE FOR KINEMATIC VISCOSITY OF:

300 Cs = 150 Cs = 0 0 200 Cs = 50 Cs = 0

SEAL NUMBERS:

CERTIFICATE OF COMPLIANCE

I certify that the asphalt material shipped on this bill of lading complies with Department of Transportation specifications for the state of Nobraska

The transport tank was examined and found suitable for loading.

SHIPPER: JEBRO INC.

SUPPLIER AUTHORIZED REP. & WEIGHER

Reed: ** Fumo**

Terminal: Sloux City, IA Bill of Lading Number:

22423

and the second s



Report Number 98-225-2074

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

PO/Proj. #: 2596

TÄNK 20

For: (7691) JEBRO INC (712)277-8855

Date Reported: 08/13/98 Date Received: 08/04/98

Analyst-

Mail to:

JEBRO INC 2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001

Lab number: 412909

Sample ID: ID #83

		Level		Detection		Analyst-
Analysis Total halogens Arsenic (dissolved) Cadmium (dissolved) Lead (dissolved)	1	Found 0.05 n.d. 1.28 24.4	% mg/kg mg/kg mg/kg	0.02 5.0 0.05 0.5	Method ASTM D1317-118 EPA 6010 EPA 6010 EPA 6010	Date jjd-08/05 pmd-08/13 pmd-08/13 pmd-08/13
Chromium (dissolved) Ignitability			mg/kg deg F	0.1	EPA 6010 ASTM D93	jjd-08/07

Notes:

n.d. - Not Detected.

Respectfully Submitted

Client Services

7.387 380



Report Number 98-210-2024

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 07/29/98 Date Received: 07/08/98

Mail to:

JEBRO INC 2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001 PO/Proj. #: 2567 TANK 20

Lab number: 408025

Sample ID: ID #82

	Level	Detection	Analyst-
Analysis	Found Units	Limit Method	Date
Total halogens	0.04 %	0.01 ASTM D1317-118	jjd-07/10
Arsenic (dissolved)	n.d. mg/kg	5.0 EPA 6010	pmd-07/28
Cadmium (dissolved)	0.85 mg/kg	0.05 EPA 6010	pmd-07/28
Lead (dissolved)	27.3 mg/kg	0.5 EPA 6010	pmd-07/28
Chromium (dissolved)	1.6 mg/kg	0.1 EPA 6010	pmd-07/28
Ignitability	183 deg F	39 ASTM D93	jjd-07/15
19	C		

Notes:

n.d. - Not Detected.

Sample was prepared for metals analysis by EPA method 3040.

Respectfully Submitted

Heather Rank

Heather Ramig Client Services

> 7. 375 4.670 385



Report Number 96-114-2036

13611 "B" Street • Omaha, Nebraska 68144-3693 • (402) 334-7770 • FAX (402) 334-9121

REPORT OF ANALYSIS

For: (7691) JEBRO INC (712)277-8855

Date Reported: 04/23/96 Date Received: 04/18/96

Analyst-

Mail to:

JEBRO INC

2303 BRIDGEPORT DRIVE SIOUX CITY IA 51111-1001 PO/Proj. #: 436139

USED OIL SLUDGE ANALYSIS - STRAINER

Lab number: 295669 Sample ID: TANK 38 ID # TCLP

	Level		Detection	n		naiyst-
Analysis	Found	Units	Limit	Method		Date
Arsenic (TCLP)		mg/L	0.5	EPA 6010		c-04/23
Barium (TCLP)		mg/L	0.005	EPA 6010		cc-04/23
Mercury (TCLP)		mg/L	0.0002	EPA 7470		cc-04/23
Selenium (TCLP)		mg/L	0.10	EPA 6010		cc-04/23
Silver (TCLP)		mg/L	0.01	EPA 6010		cc-04/23
Chromium (TCLP)		mg/L	0.01	EPA 6010		cc-04/23
Lead (TCLP)		mg/L	0.05	EPA 6010		cc-04/23
Cadmium (TCLP)		mg/L	0.005	EPA 6010		cc-04/23
Nickel (TCLP)		mg/L	0.01	EPA 6010		cc-04/23
Copper (TCLP)		mg/L	0.01	EPA 6010		cc-04/23
Zinc (TCLP)		mg/L	0.01	EPA 6010	ac	cc-04/23
Zilic (I CLI)	22.0					

Notes:

n.d. - Not Detected.

Respectfully Submitted

Heather Ramig/Lisa Dworak

Client Services

Dike Volumes at Jebro Inc.

From: Michael Marlow

Sent: Friday, September 04, 1998 9:33 AM

To: 'homerd@ttemi.com'

Cc: Susan Lowery

Subject: Dike Volumes at Jebro, Inc.

David,

I am listing the dike volumes and corresponding tank capacities that are

in each dike area to help complete your inspection.

Tank Number

Tank Storage Capacity

Dike Volume

T20

83000 gals

4,193,288 gals

300 series tanks

100000 gals

492,446 gals

T18 & T29 (poly area)

17900 gals

1,012,.672 gals

T5

1,000,000 gals

2,320,633 gals

We have determined that the clay base in our containment areas is 24 inches in depth.

Please call or E mail us if we can be of further assistance.

Sincerely, Mike

ATTACHMENT F RCRIS HANDLER INFORMATION REPORT

The information summarized below has been entered into EPA's RCRA Computer Data Base for the INSTALLATION LOCATION AND EPA RCRA Pentification Number listed. If any of this information is inaccurate, you may notify us of the change(s) by writing to us, ephoning us, or by completing a Notification of Regulated Waste Activity Form (EPA Form 8700-12), a copy of which is attached, or aply marking any changes on this report and sending it to EPA at:

EPA REGION 7 - ARTD/RESP 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

four cooperation in helping us to maintain accurate records is appreciated. If you have any questions, please call our Iowa RCRA Hazardous Waste Inquiry Helpline number (913) 551-7861, and leave a message. Someone will get back to you as soon as possible.

EPA RCRA ID Number:

IAD020201604

ame of Company/Installation:

JEBRO INC

Location of Installation:

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

ity/State/Zip:
ounty:

WOODBURY

Mailing Address:
 ity/State/Zip:

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

'nstallation Contact:

SUSAN LOWREY

ob Title:

SAFETY SUPVR (712)277-8855

none Number:

2303 BRIDGEPORT DR

Contact's Address:
 ity/State/Zip:

SIOUX CITY, IA 51111

Current Owner of Installation:

YPE(S) OF REGULATED ACTIVITY:

JEBRO INC

wner's Address:
ity/State/Zip:

2303 BRIDGEPORT DR SIOUX CITY, IA 51111

Phone Number:

(712)277-8855

and Type: Owner Type:

Private

Private

.

USED OIL FUEL MARKETER

USED OIL TRANSPORTER

USED OIL TRANSPORTER - TRANSFER FACILITY

hazardous Wastes Handled:

UOIL

10/08/96 * N 10/08/96

SUSANT NEW YORK SIGNATURE

Susan Lowrey
Safety - Human Resource
Supervisor 9-1-0

NAME & OFFICIAL TITLE

DATE SIGNED

information you submit in a notification can be released to the public, according to the Freedom of Information Act, unless it is ermined to be confidential by U.S. EPA pursuant to 40 CFR Part 2. Since notification information is very general, the U.S. EPA believes it is unlikely that any information in your notification could qualify to be protected from release. However, you may make a claim of confidentiality by printing the word "CONFIDENTIAL" on both sides of the Notification Form and on any attachments or mittals including this information report. EPA will take action on the confidentiality claims in accordance with 40 CFR Part 2.